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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,
Plaintiff,

vs.

WOODCREST HOMEOWNERS
ASSOCIATION, LAS VEGAS
DEVELOPMENT GROUP, LLC; DOE
INDIVIDUALS I-X, inclusive, and ROE
CORPORATIONS I-X, inclusive,
Defendants.

CASE NO.: 2:15-cv-01193-MMD-GWF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT**
(First Request – First Stipulation and Order For Extension was Denied)

Defendant WOODCREST HOMEOWNERS ASSOCIATION ("HOA") and Plaintiff BANK OF AMERICA, N.A. ("BANA"), by and through their respective counsel of record, stipulate, agree, and jointly request this Court to retrospectively allow for an extension of time for the HOA to respond to BANA's Complaint (Document No. 1) by November 5, 2015.

The parties would like to note that the parties' first proposed Stipulation and Order For Extension of Time to Respond to Complaint (First Request) (Document No.

1 13) has been denied by this Court for lack of reasons as to why Document No. 13 was
2 filed after the response due date already had passed.

3 Per this Court's instruction, the parties provide the reasons as follows:

4 1. The Complaint (Document No. 1) was filed on June 23, 2015. Affidavit of
5 Service on the HOA (Document No. 7) was filed on July 8, 2015, indicating service
6 date of June 24, 2015. The HOA originally had until July 14, 2015 to respond to the
7 Complaint.

8 2. The law firm of Lipson, Neilson, Cole, Seltzer & Garin, P.C. ("Firm") was
9 retained to represent the HOA in late September of 2015, after the response due date
10 was passed.

11 3. The Firm promptly contacted Plaintiff's counsel Eric S. Powers, Esq. of
12 Akerman, LLP on October 9, 2015 requesting for a stipulation to extend time for the
13 HOA to respond to the Complaint.

14 4. On October 30, 2015, Mr. Powers stipulated.

15 5. There was further delay in filing Document No. 13 because there was confusion
16 with there being another matter in the Firm with the same HOA and the same bank,
17 implicating another property on the same street.

18 6. Furthermore pursuant to Local Rule 6-1(b), the parties state the reason for the
19 filing Document No. 13 was that the HOA required more time to evaluate and to
20 respond to Document No. 1. The parties entered into the agreement in good faith and
21 not for purposes of delay. Document No. 13 was the parties' way of accommodating
22 one another given the overall increase in litigation in this area of law.
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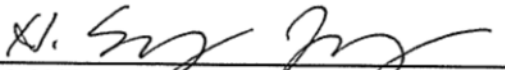
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1 Dated: 11/12/15

Dated: 11/12/15

2 LIPSON, NEILSON, COLE, SELTZER
3 & GARIN, P.C.

AKERMAN LLP

4 By: 

By:  8276

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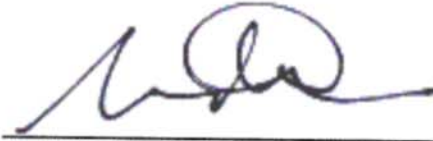
BANK OF AMERICA, N.A. v. WOODCREST HOMEOWNERS ASSOCIATION
CASE NO. 2:15-cv-01193-MMD-GWF

ORDER

Based on the foregoing stipulation of the parties,

IT IS SO ORDERED.

DATED: November 12, 2015.



UNITED STATES DISTRICT COURT JUDGE

Lipson, Neilson, Cole, Seltzer & Garin, P.C.

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Las Vegas, Nevada 89144

(702) 382-1500 FAX: (702) 382-1512

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of November, 2015, service of the foregoing STIPULATION AND ORDER FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT (First Request – First Stipulation and Order For Extension was Denied) was made pursuant to FRCP 5(b) and electronically transmitted to the Clerk's Office using the CM/ECF system for filing and transmittal to all interested parties.

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